Case 1:08-cv-02465-NRB



MICHAEL A. CARDOZO

Corporation Counsel



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DATE 1. 325 08

THE CITY OF NEW YORK
LAW DEPARTMENT

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March 24, 2008

BY HAND DELIVERY

Honorable Naomi R. Buchwald United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

Re: Devrim Gundogdu v. The City of New York, et. al. CV 02465 (NRB) (AJP)

Your Honor:

I am a Senior Counsel in the Special Federal Litigation Division of the New York City Law Department. I am writing, on behalf of the City of New York, to respectfully request a 60 day enlargement of time, from March 31, 2008 to May 30, 2008, to answer or otherwise respond to the complaint. This request for an extension is the City's first. Plaintiff's counsel has consented to this request.

There are several reasons for seeking an enlargement of time. In accordance with this office's obligations under Rule 11 of the Federal Rules of Civil Procedure, we need time to investigate the allegations of the complaint. In this case, plaintiff Devrim Gundogdu alleges that she was falsely arrested for allegedly being in possession of a forged instrument. Accordingly, it is necessary for defendant City of New York to acquire as much information as possible concerning this matter in order to properly assess the case and respond to the complaint. To that end, this office is in the process of forwarding to plaintiff for execution a N.Y.C.P.L. §160.50 release so that we can access the sealed records from her underlying criminal prosecution.

In view of the foregoing, it is respectfully requested that the City's time to answer or otherwise respond to the complaint be extended until May 30, 2008.

Thank you for your consideration in this regard.

Respectfully submitted,

Afsaan Saleem

Senior Counsel Special Federal Litigation Division

cc: BY FAX

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